

ISMAIL J. RAMSEY (CABN 189820)  
United States Attorney

KATHERINE L. WAWRZYNIAK (CABN 252751)  
Chief, Criminal Division

JOHN C. BOSTIC (CABN 264367)  
Assistant United States Attorney

150 Almaden Boulevard, Suite 900  
San Jose, California 95113  
Telephone: (408) 535-5061  
FAX: (408) 535-5081  
[john.bostic@usdoj.gov](mailto:john.bostic@usdoj.gov)

Attorneys for United States of America

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

## SAN JOSE DIVISION

UNITED STATES OF AMERICA,

**Plaintiff,**

V.

JENNIFER YANG & DANIEL WU,

## Defendants.

) CASE NO. 16-CR-00334 LHK

) CASE NO. 16-CR-00335 LHK

) ) JOINT STIPULATION REGARDING SELF-  
 ) SURRENDER DATE; [PROPOSED] ORDER

JENNIFER YANG & DANIEL WU,

### Defendants.

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The United States and Defendants Jennifer Yang and Daniel Wu, by and through their counsel, stipulate and agree that the Court should set a self-surrender date of August 7, 2023 for the Defendants in this case.

On December 19, 2019, Defendants Jennifer Yang and Daniel Wu were convicted of: (1) Visa Fraud; (2) Mail Fraud; and (3) Conspiracy to Commit Visa Fraud, Mail Fraud, and Aggravated Identity Theft. ECF No. 344

On August 19, 2020, the Honorable Lucy H. Koh sentenced Defendant Jennifer Yang to 46 months imprisonment on each of the four counts of conviction, to be served concurrently and followed by three years of supervised release. ECF No. 413. Defendant Daniel Wu was sentenced that same date

1 to 24 months of imprisonment on each of the four counts of conviction, to be served concurrently and  
 2 followed by three years of supervised release. *Id.* Both Defendants were ordered to self-surrender to  
 3 their designated facility by February 3, 2021. *Id.*

4 On January 5, 2021, Judge Koh granted Defendants' Motions for Bail Pending Appeal. ECF  
 5 Nos. 473, 474.

6 On October 18, 2022 the Ninth Circuit issued the Mandate as to Defendants' appeals, affirming  
 7 the District Court's judgment and putting it into effect as of that date. ECF No. 484. Because the self-  
 8 surrender date originally set by the Court was preempted by the Court's granting of Defendants'  
 9 Motions for Bail Pending Appeal, it is necessary to set a new self-surrender date for each Defendant.

10 Accordingly, the parties hereby stipulate and agree that each Defendant shall surrender for service  
 11 of sentence at the institution designated for them by the Bureau of Prisons by 2:00 p.m. on August 7,  
 12 2023.

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14 DATED: June 20, 2023

Respectfully submitted,

15 ISMAIL J. RAMSEY  
 16 United States Attorney

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/s/ John C. Bostic  
 JOHN C. BOSTIC  
 Assistant United States Attorney

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DATED: June 20, 2023

/s/ Mark Flanagan  
 MARK FLANAGAN  
 BENJAMIN CONERY  
 NAOMI CHUNG  
 Counsel for Defendant Jennifer Yang

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20 DATED: June 20, 2023

/s/ Alyssa Bell  
 ALYSSA BELL  
 Counsel for Defendant Daniel Wu

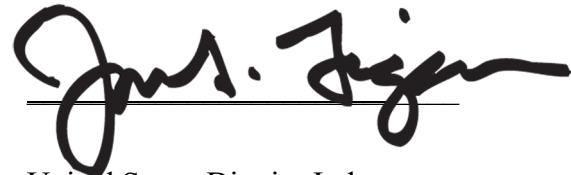
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1                   **[PROPOSED] ORDER**

2       Having considered the stipulation of the parties, the Court hereby ORDERS that Defendants  
3 Jennifer Yang shall surrender for service of sentence at the institution designated for her by the Bureau  
4 of Prisons by 2:00 p.m. on August 7, 2023. Defendant Daniel Wu shall surrender for service of sentence  
5 at the institution designated for him by the Bureau of Prisons by 2:00 p.m. on August 7, 2023

6       IT IS SO ORDERED.

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8       DATED: June 21, 2023



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10                   United States District Judge

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